

ENTERED

July 17, 2023

Nathan Ochsner, Clerk

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

VANGUARD ENERGY, LLC

Plaintiff,

V.

GLOBAL ENTERPRISE SOLUTIONS,
LLC and XD VENTURES, LLC,

Defendants.

[illegible]

Civil Matter No.: 1:21-cv-00117

Jury Demanded

STIPULATION AND ORDER TO MODIFY AGREED SCHEDULING ORDER (DOC. 42)

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff and Counter-Defendant, Vanguard Energy, LLC (“Vanguard”), and Counter-Plaintiffs Global Enterprise Solutions, LLC (“GES”) and XD Ventures, LLC (“XD”) (collectively “The Parties”), through their respective counsel of record, jointly submit the following Stipulation to Modify Agreed Scheduling Order to extend the deadlines pertaining to experts set by the Court as set forth in in the Agreed Scheduling Order (Doc. 42) in this case.

This Stipulation is made pursuant to Federal Rules of Civil Procedure 6(b) and 16(b)(4).

The parties stipulate and agree to a short continuance of GES and XD's expert deadlines by thirty (30) days to allow more time to designate expert witnesses, prepare expert reports and evaluate what further discovery is needed to ready this case for trial. Vanguard requested an extension to respond to GES and XD's discovery requests and GES and XD granted this extension with the caveat that the Parties extend GES and XD's expert and report deadline to allow GES and XD sufficient time to review Vanguard's discovery responses. As such, the Parties stipulate to extend GES and XD's expert and report for affirmative relief deadline to July 21, 2023.

STIPULATION

WHEREFORE, IT IS STIPULATED AND AGREED BY AND BETWEEN THE PARTIES,
that the following deadlines pertaining to experts are stipulated below.

Deadline	Current Deadline	Stipulated Deadline
GES and XD's expert and report for affirmative relief deadline: <i>See</i> FRCP 26(a)(2)(D); Local Rule 9(A)(4).	06/14/2023	07/21/2023

IT IS SO STIPULATED.

Dated: July, 7, 2023.

Respectfully submitted,

Butch Boyd Law Firm

/s/ Ernest W. Boyd

Ernest W. Boyd (Lead Attorney)

State Bar No. 00783694

butchboyd@butchboydlawfirm.com

Jillian Scherrer

State Bar No. 24117793

jillianscherrer@butchboydlawfirm.com

2905 Sackett Street

Houston, TX 77098

713-589-8477 (Phone)

713-589-8563 (Fax)

***COUNSEL FOR DEFENDANT AND
COUNTER-PLAINTIFFS GLOBAL
ENTERPRISE SOLUTIONS, LLC AND XD
VENTURES, LLC***

Dated: July 7, 2023.

Atlas Hall & Rodriguez LLP

/s/ E. Michael Rodriguez *with permission

E. Michael Rodriguez

State Bar No. 00791553

S. D. Tex. No. 18759

mrodriguez@atlashall.com

Eduardo Roberto Rodriguez

State Bar No. 00000080

S.D. Tex. No.1944

erodriguez@atlashall.com

222 N. Expressway, Suite 203

Brownsville, Texas 78520


Telephone: (956) 574-9333

Facsimile: (956) 574-9337

**ATTORNEYS FOR PLAINTIFF, AND
COUNTER-DEFENDANT VANGUARD
ENERGY LLC**

IT IS SO ORDERED.

Dated: July 17, 2023


ROLANDO OLVERA
UNITED STATES DISTRICT JUDGE